

REMARKS

Applicant respectfully requests reconsideration of this application as amended.

Claims 1-5, 7-11, 14-18 and 21 have been amended. Claims 6, 12-13 and 19-20 have been cancelled without prejudice. No new claims have been added. Therefore, claims 1-5, 7-11, 14-18 and 21 are presented for examination.

Objection

Claims 12-14 and 19-21 stand objected under 37 C.F.R. 1.75(c) as being in improper form because a multiple dependent claim must refer as an alternative only.

Claims 12-13 and 19-20 have been cancelled without prejudice which obviates the objection, which claims 14 and 21 no longer depend from a multiple dependent claim.

35 U.S.C. § 102 Rejection

Claims 1-21 stand rejected under 35 U.S.C. §102(b) as being anticipated by Bekritsky, et al., U.S. Patent Publication No. 2002/0059535 (“Bekritsky”).

Applicants respectfully submit that Bekritsky discloses “*synchronizing internal clocks of receiving stations of a locating system . . . [and a] first arrival time is compared to a second arrival time to determine a correlated arrival time data . . . [and a] linear polynomial fit is computed as a function of the correlated arrival time data and the first and second arrival times.*” (Abstract).

In contrast, claim 1, as amended, in pertinent part, recites “*synchronizing a second node timing model with a first node timing model, and further synchronizing the first and second node timing models with a global clock associated with the first node and the second node*”. (emphasis provided). Although Bekritsky discloses *synchronizing*

internal clocks of receiving stations, it does not teach or reasonably suggest having a global clock to with a first and second timing models are synchronized (see claim 1). Having *synchronized internal clocks* does not equate having a global clock, associated with a first node and a second node, to which the first and second timing models are synchronized (see claim 1). Accordingly, Applicants respectfully request the withdrawal of the rejection of claim 1 and its dependent claims.

Claims 8 and 15 include limitations similar to those of claim 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 8 and 15 and their dependent claims.

Conclusion

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Request for an Extension of Time

Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

Charge our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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